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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

UNITED STATES OF AMERICA,)	No. CR-14-0057 JST
)	
Plaintiff,)	STIPULATED REQUEST TO SET MATTER FOR
)	GUILTY PLEA AND EXCLUDE TIME UNDER
v.)	THE SPEEDY TRIAL ACT
)	
JULIO CESAR RAMOS-CALVILLO,)	
)	
)	
Defendant.)	
)	
)	

This matter is currently set before this Court for a status conference on March 14, 2014, following indictment. The parties request that this Court vacate that status date and set the matter for a change-of-plea hearing on April 18, 2014. With the agreement of the parties, the Court enters this order documenting the exclusion of time under the Speedy Trial Act, 18 U.S.C. §3161(h)(7)(A), and (h)(7)(B)(iv) from March 14, 2014 to April 18, 2014.

The parties agree to the exclusion of time under the Speedy Trial Act to allow effective preparation of defense counsel, who needs time to verify criminal history and Sentencing Guidelines calculations, and meet with her client with the assistance of an interpreter. Additionally, counsel for Defendant is unavailable on April 4, 2014 and counsel for the government is unavailable on April 11,

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2014. For those reasons, time is excludable pursuant to 18 U.S.C. § 3161 (h)(7)(A), and (h)(7)(B)(iv).

Given these circumstances, the Court found that the ends of justice served by excluding the period from March 14, 2014 to April 18, 2014 from Speedy Trial Act calculations outweighs the interests of the public and the defendant to a speedy trial in accordance with 18 U.S.C. § 3161(h)(7)(A), and (h)(7)(B)(iv).

DATED: March 11, 2014

Respectfully submitted,

MELINDA HAAG
United States Attorney

/s/ Angela Hansen
ANGELA HANSEN
Attorney for Julio Cesar Ramos-Calvillo

/s/ Christina McCall
CHRISTINA McCALL
Assistant United States Attorney

ORDER

Based on the reasons provided in the stipulation of the parties above, with the consent of both parties, the Court orders that the status date currently set for March 14, 2014 is vacated, and the matter is set for a change-of-plea hearing on April 18, 2014. The period from March 14, 2014 to April 18, 2014 be excluded from Speedy Trial Act calculations, pursuant to 18 U.S.C. § 3161(h)(7)(A), and (h)(7)(B)(iv).

IT IS SO ORDERED.

DATED: March 11, 2014


JON S. TIGAR
United States District Judge